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verizon

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July 25, 2007

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VIA HAND DELIVERY

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554 Federal Communications Commission Office of the Secretary

Re: Section 63.71 Application of MCI Communications Services, Inc.

Dear Ms. Dortch:

Pursuant to Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, MCI Communications Services, Inc. ("MCI"), located at 22001 Loudon County Parkway, Ashburn, Virginia 20147, hereby provides notice that, beginning on September 4, 2007, MCI will no longer permit users of MCI's Prepaid Phone Card purchased from Costco stores to recharge their cards using a credit card with an Alaskan billing address or by calling to recharge their cards from an Alaskan telephone number. Alaskans who currently have these calling cards may continue to use them until they have a zero balance, even if that occurs after September 4. After September 4, such users will not be permitted to add value to these cards using either method described above. The calling cards are no longer sold in Costco's Alaska stores.

Given the nature of prepaid calling cards, MCI does not know the names or mailing addresses of the holders of these calling cards, and MCI therefore cannot provide written notice to those card holders. MCI has, however, undertaken several measures to orally notify calling card users of this change. On July 17, 2007, MCI commenced providing oral notice to calling card users of the loss of recharge capability of the prepaid calling cards in three ways: (1) when the card user makes a call from Alaska, whether intrastate or interstate, the notice would automatically be played for the caller; (2) when the card user recharges the card by (a) calling from an Alaskan telephone number or (b) billing to a credit card with an Alaskan address, the notice would automatically be played for the caller; and (3) when the card user dials his or her access code to place a prepaid calling card call, they reach a main menu at which one of their options would automatically inform them as follows: "If you use your prepaid calling card to make calls from Alaska, press 9 to hear information about changes in the capability to recharge your card."

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The content of the advance oral notice for (1) and (2) above is as follows: "Starting September 4, 2007, recharging your Verizon or MCI Prepaid Calling Cards to make calls from Alaska will no longer be an option available to you. For more information about this change or to request a refund of the unused balance remaining on your Card, please call the customer service number located on the back of your card." The content of the advance notice for (3) above is slightly different because anyone with an MCI prepaid calling card purchased from any Costco store would hear the oral notice, which is as follows: "Starting September 4, 2007, recharging your Verizon or MCI Prepaid Calling Cards to make calls from Alaska may no longer be an option available to you. For more information about this change or to request a refund of the unused balance remaining on your Card, please call the customer service number located on the back of your card."

Once recharge capability has been terminated on September 4, 2007, oral notice will continue to be played any time a prepaid calling card user attempts to recharge his or her card by (a) calling from an Alaskan telephone number, or (b) billing to a credit card with an Alaskan address. This oral notice is similar to the advance oral notice discussed above. In addition, MCI will continue to provide oral notice through the main menu (i.e., "press 9") for the benefit of visitors to Alaska who might attempt to use their prepaid cards while in Alaska. Finally, oral notice will continue to be played on each prepaid card call (both interstate and intrastate) made from Alaska for another sixty (60) days after the date that recharge capability is terminated (i.e., November 3) to ensure that Alaskan card users are aware of the change before they need to recharge their cards.

MCI is considered non-dominant with regard to the service being discontinued, reduced, or impaired.

Sincerely,

Rashann R. Duvall

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cc:

Regulatory Commission of Alaska Office of the Governor of Alaska

Secretary of Defense, Attn: Special Assistant for Telecommunications